

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS – EASTERN DIVISION

Diane M. Crumpley,

Plaintiff,

v.

Rich Township High School District # 227,

Defendant.

FILED: JUNE 17, 2008

08CV3467

JUDGE HOLDERMAN

MAGISTRATE JUDGE VALDEZ

TG

Complaint for Discrimination

01. This Court has jurisdiction because the events complained of happened in Cook County, IL, within this judicial district, per 42 USC § 1981, 2000e *et seq.*, 29 USC § 626 *et seq.*, 28 USC § 1331,

02. Plaintiff is a former employee of Defendant who lives in Frankfurt, IL,

03. Defendant is a public entity with offices in Olympia Fields, IL,

04. Plaintiff filed her Charge of Discrimination with the Chicago Office of the EEOC on September 4, 2007, Ex. 1,

05. Plaintiff's attorney received the Right To Sue Letter from the DOJ on March 24, 2008, Ex. 2,

06. This Complaint is filed within 90 days of receipt of the Right To Sue Letter,

07. Defendant by its agents and employees discriminated against Plaintiff because of her white race, age (dob 5.2.64), and female sex in 2007 in the terms and conditions of her employment as a teacher, by preparing phony performance reviews, denying Plaintiff tenure with Defendant, favoring black teachers over Plaintiff by allowing said black teachers to get better performance reviews based on phony evaluations, then finally firing Plaintiff in March 2007 on the pretext of bad performance when the real reason was that Plaintiff had reported to Defendant's Principal the non-compliance and falsification of documents-records by Defendant's black teachers with the No Child Left Behind Act for students.

08. Defendant's conduct was taken maliciously, in reckless disregard of Plaintiff rights, and has proximately caused damage to Plaintiff.

WHEREFORE, Plaintiff requests judgment against Defendant under § 1981 for \$500,000 in actual damages, \$500,000 in punitive damages, under § 2000e et seq. for \$300,000, under § 626 et seq. for \$70,000 plus twice actual damages as liquidated damages, costs, attorneys and witness' fees and such other relief as the Court allows.

s/ William B. Thompson #3123041
Attorney for Plaintiff
P.O. Box 584, Wheaton, IL 60189
630-690-1971

EEOC Form 5 (5/01)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

<input type="checkbox"/>	FEPA
<input checked="" type="checkbox"/>	EEOC

and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)

Ms Diane M. Crumpley

Date of Birth
May 2, 1964

Street Address

21982 Rosemary Road, Frankfort, IL 60423

City, State and ZIP Code

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two are named, list under PARTICULARS below.)

Name

Rich Township High School District

RECEIVED

No. Employees, Members
Over 500

Phone No. with Area Code

Street Address

2000 Governors Drive, Suite 200, Olympia Fields, IL 60461

City, State and ZIP Code

Name

CHICAGO DISTRICT OF C

No. Employees, Members

Phone No. with Area Code

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

<input checked="" type="checkbox"/> RACE	<input type="checkbox"/> COLOR	<input checked="" type="checkbox"/> SEX	<input type="checkbox"/> RELIGION	<input type="checkbox"/> NATIONAL ORIGIN
<input checked="" type="checkbox"/> RETALIATION	<input checked="" type="checkbox"/> AGE	<input type="checkbox"/> DISABILITY	<input type="checkbox"/> OTHER (Specify below.)	

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

3.12.07

 CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)).

See attached Rider.

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JUDGE HOLDERMAN

MAGISTRATE JUDGE VALDEZ

TG

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State or Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWEORN TO BEFORE ME THIS DATE

8/10/07
DateDiane M. Crumpley
Charging Party Signature

RECEIVED EEOC
SEP 11 4 2007

Diane M. Crumpley Rider # 1 to EEOC Charge:

Rich Township High School District 227 (Rich) through its employees, supervisors and agents discriminated against me in March 2007 on the basis of my sex (female), my race (white), my age (dob 5.2.64); Rich also retaliated against me as a teacher for refusing to falsify students' work so that Rich could meet the Federal "No Child Left Behind" law's standards. A black co-teacher, Ronette Barnes age 24, was so upset with me for having complained to the Principal about the falsifications that she actually yelled at me in the school for having disclosed the falsifications. The above discrimination took the form of pretextual, phony negative supervisor performance reviews resulting in my being fired on 3.12.07; my supervising Principal, a Dr. Craig, held a discussion with me shortly before 3.12.07 in which the fact that I would achieve "tenure" with Rich after the upcoming performance review was discussed, and he acknowledged that once I achieved tenure it would be more difficult to fire me. Rich allowed a black teacher to simply chatter with the Evaluator who thereafter wrote the teacher "exceeded standards" for a teacher; on another occasion, the same Evaluator observed the teaching performance of another black teacher for five minutes, perhaps fewer, and wrote that this teacher "exceeded standards". As a white teacher, I was performing my job above Rich's standards but was fired anyhow and black, younger teachers were retained by Rich.



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE
WITHIN 90 DAYSCERTIFIED MAIL
5054 5970950 Pennsylvania Avenue, N.W.
Karen Ferguson, EMP, PHB, Room 4239
Washington, DC 20530

Ms. Diane M. Crumpley
 c/o William B. Thompson, Esquire
 Attorney at Law
 P.O. Box 584
 Wheaton, IL 60189-0584

March 17, 2008

Re: EEOC Charge Against Rich Township High School Dist. #227
 No. 440200707623

Dear Ms. Crumpley:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

08CV3467

JUDGE HOLDERMAN
 MAGISTRATE JUDGE VALDEZ
 TG

Grace Chung Becker
 Acting Assistant Attorney General
 Civil Rights Division

by

Karen L. Ferguson
 Karen L. Ferguson
 Supervisory Civil Rights Analyst
 Employment Litigation Section

cc: Chicago District Office, EEOC
 Rich Township High School Dist. #227

RECEIVED
 MAR 24 08